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October 10, 2019

VIA ECF

The Honorable James B. Clark, III
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: Middlesex Water Company v. 3M Company (f/k/a Minnesota Mining and
Manufacturing, Co.), et al., Docket No. 2:18-cv-15366 (CCC-JBC)**

Dear Judge Clark:

We represent the Plaintiff in the above-referenced case. Pursuant to Your Honor's September 17, 2019, Order (the "Order") [ECF Doc. No. 31], the Parties write to advise the Court of the current status of discovery in this action.

Specifically, pursuant to the Order, by October 10, 2019, the Parties were instructed to bring any unresolved discovery disputes to the Court's attention. By way of background, on September 27, 2019, the Parties served their respective discovery responses. Presently, the Parties are in the process of reviewing each side's discovery responses and had their initial meet and confer today.

The Parties anticipate additional meet and confers relating to these discovery responses over the course of the next couple of weeks, which we hope will further clarify and potentially resolve any discovery disputes that would otherwise require Court attention. At present, there is no dispute yet ripe to bring. Nonetheless, the Parties felt it prudent to apprise the Court of the current status of the efforts to further the discovery process, and respectfully request permission to bring unresolved discovery disputes to the Court's attention as the Parties further meet and confer.

Finally, pursuant to the Order, on Monday, October 14, 2019, the Parties are instructed to submit a joint status letter to the Court. The parties respectfully and jointly request that the instant submission likewise serve as the status letter required under the Order. The Parties anticipate having a more robust report for the Court during the October 25, 2019, telephonic conference.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

DOUGLAS & LONDON, P.C.

s/Rebecca Newman

Rebecca Newman

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cc: Defense Counsel of Record (via ECF & electronic mail)